

Michael J. Harris
Law Office of Michael J. Harris
43 West 43rd Street, Suite 148
New York, NY 10036-7424

May 23, 2025

VIA ECF

Hon. Andrew E. Krause, U.S.M.J.
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

**Re: *Project Veritas et al. v. O’Keefe et al.*, No. 23-CV-04533-CS-AEK
(S.D.N.Y.)**

Dear Judge Krause:

I write on behalf of Counterclaim-Defendants Project Veritas (“PV”) and Project Veritas Action Fund (“PVAF”) (collectively, “Counterclaim-Defendants”), jointly with counsel for Counterclaim-Plaintiffs James O’Keefe and Transparency 1, LLC d/b/a O’Keefe Media Group (collectively, “Counterclaim-Plaintiffs”), in accordance with the Court’s May 9, 2025 Order requiring a status report with respect to the requests for production to Mr. Wetmore and Mr. Hughes. (*See* Dkt. 153).

The parties met and conferred regarding such document requests on May 14, 2025, as a result of which, there are presently no remaining disputes for the Court’s consideration.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Michael J. Harris", written in a cursive style.

Michael J. Harris